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March 11, 2002

Dorothy T. Attwood, Chief
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W., Room 5-A848
Washington, D.C. 20554

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

**Re: Implementation of the 911 Abbreviated Dialing Code
CC Docket No. 92-105, WT Docket No. 00-110
Sprint PCS Transition Report**

Dear Ms. Attwood and Mr. Sugrue:

Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint PCS"),¹ provides commercial mobile radio services in 42 of the counties listed in Appendix D to the Commission's *Fifth Report and Order*.² Sprint PCS is pleased to report that it has completed the conversion to abbreviated 911 dialing in all 42 areas and is currently delivering to an appropriate local emergency authority calls dialed with the digits 9-1-1 (Exhibit 1). Accordingly, because Sprint PCS has already completed all necessary translation and routing work to deliver 911 calls for the counties that it currently serves, it is herein attaching a certification (Exhibit 2) in lieu of a later submission of a second report.³ If necessary, Sprint PCS will file a second report, if Sprint PCS deploys new service in one of the listed counties or if a county implements 911 where 911 is not currently deployed.

Phase I and Phase II Enhanced 911 Services

Sprint PCS is a leader in the deployment of 911 and enhanced 911 (E911) services and provides the following background information regarding its deployment activities. Sprint PCS is proud to report that, as of February 28, 2002, it is providing Phase I E911 service to over 1,300

¹ This report is intended to cover all counties that are served under FCC licenses granted to Sprint PCS. Sprint Spectrum L.P.'s parent company is Sprint Spectrum Holding Company, L.P. Sprint Spectrum Holding Company L.P. is a wholly-owned subsidiary of Sprint Corporation. Sprint PCS is a CMRS carrier that provides wireless services under licenses issued to WirelessCo, L.P., SprintCom, Inc., Sprint PCS License, L.L.C., and APC PCS, LLC. This report also includes those counties where Sprint PCS has an agreement with another entity that provides network management services.

² See *Implementation of 911 Act, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, Fifth Report and Order*, CC Docket No. 92-105, *First Report and Order*, WT Docket No. 00-110, FCC 01-351, (Dec. 11, 2001) ("Fifth Report and Order").

³ See *Public Notice*, "Carrier Transition Reports for Implementation of the 911 Abbreviated Dialing Code Pursuant to the Wireless Communications and Public Safety Act of 1999," DA 02-507, at 2 (March 1, 2002).

public safety answering points ("PSAPs"). By June 30, 2002, Sprint PCS expects to be providing Phase I service to approximately 2,000 PSAPs.

Sprint PCS is also pleased to advise the Commission of its achievements in Phase II E911 service. In 2001, we sold over 120,000 GPS-capable handsets and last month, Sprint PCS launched its second GPS-capable handset model. Additionally, Sprint PCS launched throughout the State of Rhode Island, the nation's first operational Phase II E911 system using the assisted GPS solution (a Lucent market), and is in the process of launching Phase II in St. Clair County, Illinois (a Nortel market).

Sprint PCS has moved beyond the research and development/testing phase, and into commercial installation and deployment of operational Phase II systems. If PSAPs and their E911 networks are ready, several hundred PSAPs — including the States of Connecticut, New Jersey and Tennessee and such cities as Dallas, Houston, Los Angeles, Miami, San Francisco and Seattle — should have operational Phase II systems from Sprint PCS before the end of the year.

Universal 911 Dialing Implementation Report

Sprint PCS is committed to providing all forms of 911 service, including basic 911. It follows the following procedures to route 911 calls to the appropriate local authority when it enters a new market.

The first step is to identify the appropriate local authority to receive emergency calls. When a new market is launched or a new cell site is deployed, the Sprint PCS operations engineers determine the appropriate agency and then obtain the approval of that agency to receive the Sprint PCS 911 calls. If there is no established 911 service, Sprint PCS usually contacts the county authorities first to determine the appropriate recipient of emergency calls. In cases where the county authority is not the appropriate recipient, Sprint PCS continues to contact state and local agencies until the appropriate recipient is identified.

Once the approval of the local authority is received, Sprint PCS loads the appropriate routing information into the translations tables in its mobile switching centers so that 911 calls are directed to the correct destination number. When the cell site is ready for activation, Sprint PCS engineers make 911 test calls from each cell site sector (each site generally has three sectors) to ensure that the 911 calls are being routed correctly. The engineers identify themselves and indicate that they are testing emergency calls from the cell site. The engineers then seek acknowledgement that the recipient is the appropriate authority to receive emergency calls from the cell site's location.

Once the cell site is fully deployed, the 911 routing is tested periodically by the engineers. Sprint PCS has found that, with very few exceptions, the emergency authorities are very cooperative in both the initial and periodic testing necessary to verify 911 call routing.

As indicated above, Sprint PCS has developed procedures to establish 911 call routing so that emergency calls are routed to an appropriate local emergency authority. A listing of the

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counties served by Sprint PCS and the corresponding agency receiving 911 calls is reflected in Exhibit 1.

If there are any questions with respect to this report or the attached Exhibit 1, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey M. Pfaff', with a long horizontal flourish extending to the right.

Luisa L. Lancetti
Jeffrey M. Pfaff

Attachments

cc: William F. Caton, Acting Secretary

Universal 911 Dialing Transition Report
 Sprint Spectrum L.P. d/b/a Sprint PCS
 6160 Sprint Parkway, 4th Floor
 Contact Name: Jeffrey M. Pfaff
 Contact Telephone: 913-762-7737
 Fax#: 913-762-0922
 Email address: jpfaff01@sprintspectrum.com

Exhibit 1

I. Counties Where There is No 911 Service					
County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Greene	Alabama	1063	Yes	Yes	Greene Co. Sheriffs Dept.
Anchorage	Alaska	2020	No		
Lake and Peninsula	Alaska	2164	No		
Matanuska-Susitna	Alaska	2170	No		
Nome	Alaska	2180	No		
Southeast Fairbanks	Alaska	2240	No		
Wade Hampton	Alaska	2270	No		
Cleveland	Arkansas	5025	Yes	Yes	Cleveland Co. Sheriffs Dept.
Johnson	Arkansas	5071	Yes	Yes	Johnson Co. Courthouse and AR State Police
Scott	Arkansas	5127	No		
San Juan	Colorado	8111	No		
Atkinson	Georgia	13003	No		
Baker	Georgia	13007	No		
Berrien	Georgia	13019	No		
Bleckley	Georgia	13023	Yes	Yes	Bleckley Co. Sheriffs Dept.
Calhoun	Georgia	13037	No		
Candler	Georgia	13043	Yes	Yes	Candler Co. Sheriffs Dept.
Chattahoochee	Georgia	13053	Yes	Yes	Muscogee County PSAP
Clay	Georgia	13061	No		
Clinch	Georgia	13065	Yes	Yes	Clinch Co. Sheriffs Dept.
Cook	Georgia	13075	Yes	Yes	Cook Co. Sheriffs Dept.
Crawford	Georgia	13079	No		
Dooly	Georgia	13093	Yes	Yes	Dooly Co. Sheriffs Dept.

County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Irwin	Georgia	13155	No		
Johnson	Georgia	13167	No		
Lanier	Georgia	13173	Yes	Yes	Lanier Co. Sheriffs Dept.
Macon	Georgia	13193	No		
Marion	Georgia	13197	No		
McIntosh	Georgia	13191	Yes	Yes	McIntosh Co. Sheriffs Dept.
Pike	Georgia	13231	No		
Quitman	Georgia	13239	No		
Randolph	Georgia	13243	No		
Schley	Georgia	13249	No		
Stewart	Georgia	13259	No		
Talbot	Georgia	13263	No		
Taliaferro	Georgia	13265	Yes	Yes	Taliaferro Co. Sheriffs Dept.
Taylor	Georgia	13269	No		
Telfair	Georgia	13271	No		
Warren	Georgia	13301	No		
Webster	Georgia	13307	No		
Wheeler	Georgia	13309	No		
Alexander	Illinois	17003	No		
Brown	Illinois	17009	No		
Calhoun	Illinois	17013	No		
Clay	Illinois	17025	No		
Edwards	Illinois	17047	No		
Fayette	Illinois	17051	No		
Greene	Illinois	17061	No		
Hamilton	Illinois	17065	No		
Hardin	Illinois	17069	No		
Henderson	Illinois	17071	No		
Iroquois	Illinois	17075	Yes	Yes	Iroquois Co. Sheriffs Dept.
Jefferson	Illinois	17081	Yes	Yes	Jefferson Co. Sheriffs Dept.
Jersey	Illinois	17083	No		
La Salle	Illinois	17099	Yes	Yes	Illinois State Police
Menard	Illinois	17129	No		
Moultrie	Illinois	17139	No		

County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Pope	Illinois	17151	No		
Putnam	Illinois	17155	No		
Schuyler	Illinois	17169	No		
Shelby	Illinois	17173	No		
Stark	Illinois	17175	No		
Wayne	Illinois	17191	No		
Martin	Indiana	18101	No		
Parke	Indiana	18121	No		
Elk	Kansas	20049	No		
Wallace	Kansas	20199	No		
Cumberland	Kentucky	21057	No		
Gallatin	Kentucky	21077	Yes	Yes	Gallatin Co. Dispatch Center
Lewis	Kentucky	21135	No		
Owsley	Kentucky	21189	No		
Pendleton	Kentucky	21191	Yes	Yes	Pendleton Co. Dispatch Center
Robertson	Kentucky	21201	No		
Catahoula	Louisiana	22025	No		
La Salle	Louisiana	22059	Yes	Yes	Rapides Parish 911 Center
Red River	Louisiana	22081	Yes	Yes	Caddo Parish 911 Center
St. Helena	Louisiana	22091	No		
Tensas	Louisiana	22107	No		
Arroostook	Maine	23003	No		
Washington	Maine	23029	No		
Gogebic	Michigan	26053	No		
Keweenaw	Michigan	26083	No		
Ontonagon	Michigan	26131	No		
Schoolcraft	Michigan	26153	No		
Choctaw	Mississippi	28019	No		
Clay	Mississippi	28025	Yes	Yes	Clay Co. Sheriffs Dept
Tallahatchie	Mississippi	28135	No		
Barry	Missouri	29009	Yes	Yes	Monett Police Dept.
Bates	Missouri	29013	No		
Benton	Missouri	29015	No		
Bollinger	Missouri	29017	No		

County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Carroll	Missouri	29033	No		
Carter	Missouri	29035	No		
Chariton	Missouri	29041	No		
Clark	Missouri	29045	No		
Dade	Missouri	29057	No		
Douglas	Missouri	29067	No		
Hickory	Missouri	29085	No		
Iron	Missouri	29093	No		
Knox	Missouri	29103	No		
Lewis	Missouri	29111	Yes	Yes	LaGrange Police Dept.
McDonald	Missouri	29119	Yes	Yes	McDonald Police Dept./ McDonald Co. Sheriffs Dept.
Oregon	Missouri	29149	No		
Osage	Missouri	29151	No		
Ozark	Missouri	29153	No		
Putnam	Missouri	29171	No		
Randolph	Missouri	29175	Yes	Yes	Moberly Police Dept.
Reynolds	Missouri	29179	No		
Ripley	Missouri	29181	No		
Schuyler	Missouri	29197	No		
Scotland	Missouri	29199	No		
Shannon	Missouri	29203	No		
St Clair	Missouri	29185	No		
Vernon	Missouri	29217	No		
Washington	Missouri	29221	No		
Wayne	Missouri	29223	No		
Worth	Missouri	29227	No		
Logan	Nebraska	31113	No		
Nemaha	Nebraska	31127	No		
Pawnee	Nebraska	31133	No		
Perkins	Nebraska	31135	No		
Red Willow	Nebraska	31145	No		
Rock	Nebraska	31149	No		
Hamilton	New York	36041	No		

County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Schoharie	New York	36095	Yes	Yes	New York State Police
Seneca	New York	36099	No		
Steuben	New York	36101	Yes	Yes	New York State Police
Carroll	Ohio	39019	Yes	Yes	Carroll Co. Sheriffs Dept.
Columbiana	Ohio	39029	Yes	Yes	Columbiana Co. Sheriffs Dept.
Harrison	Ohio	39067	No		
Meigs	Ohio	39105	Yes	Yes	Meigs Co. Sheriffs Dept.
Monroe	Ohio	39111	No		
Noble	Ohio	39121	Yes	Yes	Noble Co. Sheriffs Dept.
Washington	Ohio	39167	Yes	Yes	Washington Co. Sheriffs Dept.
Cimarron	Oklahoma	40025	No		
Coal	Oklahoma	40029	No		
Cotton	Oklahoma	40033	No		
Dewey	Oklahoma	40043	No		
Grant	Oklahoma	40053	No		
Haskell	Oklahoma	40061	No		
Kingfisher	Oklahoma	40073	No		
McIntosh	Oklahoma	40091	No		
Murray	Oklahoma	40099	No		
Nowata	Oklahoma	40105	No		
Osage	Oklahoma	40113	No		
Roger Mills	Oklahoma	40129	No		
Wagoner	Oklahoma	40145	No		
Dewey	South Dakota	46041	No		
Gregory	South Dakota	46053	No		
Haakon	South Dakota	46055	No		
Harding	South Dakota	46063	No		
Jackson	South Dakota	46071	No		
Jones	South Dakota	46075	No		
Todd	South Dakota	46121	No		
Ziebach	South Dakota	46059	No		

County Name	State	FIPS Code	Does Sprint PCS serve this County?	Status - Are 911 Calls Being Delivered?	Name of Local Emergency Authority Receiving 911 calls
Grainger	Tennessee	47057	Yes	Yes	Grainger Co. Sheriffs Dept.
Lake	Tennessee	47095	No		
Alleghany	Virginia	51005	No		
Appomattox	Virginia	51011	Yes	Yes	Appomattox Co. Sheriffs Dept
Bland	Virginia	51021	Yes	Yes	Bland Co. Sheriffs Dept.
Lee	Virginia	51105	No		
Grant	West Virginia	54023	No		
Randolph	West Virginia	54083	No		
Ritchie	West Virginia	54085	No		
Bayfield	Wisconsin	55007	No		
Forest	Wisconsin	55041	No		
Iron	Wisconsin	55051	No		
Menominee	Wisconsin	55078	No		

II. Counties in the Process of Implementing 911 Service					
Pike	Alabama	1109	Yes	Yes	Pike Co. 911
Bond	Illinois	17005	No		
Adair	Missouri	29001	Yes	Yes	Kirkville Police Dept.
Atchison	Missouri	29005	Yes	Yes	Atchison Co. PSAP (911 was implemented in November 2001)
Lewis	New York	36049	No		
Vinton	Ohio	39163	Yes	Yes	Vinton Co. Sheriffs Dept.
Saluda	South Carolina	45081	No		
Dickenson	Virginia	51051	No		
Hardy	West Virginia	54031	No		

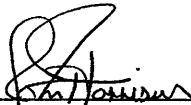
III. Counties Where There is Partial Implementation of Basic Service						
Adair	Oklahoma	40001	Yes	Yes	Colcord Police Dept.	
Blaine	Oklahoma	40011	No			
Garvin	Oklahoma	40049	Yes	Yes	Pauls Valley Police Dept. / Davis City Hall	
Okfuskee	Oklahoma	40107	Yes	Yes	Okemah Police Dept.	
Washita	Oklahoma	40149	Yes	Yes	Elk City Police Dept.	
Woodward	Oklahoma	40153	No			

CERTIFICATION OF JOHN HARRISON

I, John Harrison, hereby certify as follows:

1. I am Vice-President, Operations for Sprint PCS. In this capacity, I am responsible for the oversight of 911 services with Sprint PCS.
2. I am an authorized representative of Sprint PCS.
3. I have examined the Sprint PCS' Basic 911 Implementation Report and the attached Exhibit 1 and to the best of my knowledge, information and belief, all statements of fact contained in the Report are true.
4. Sprint PCS has completed the steps necessary to properly route 911 emergency calls in the localities covered by the Report as of February 28, 2002.

I declare under penalty of perjury that the foregoing is correct and accurate.



John Harrison
Vice-President, Operations
March 7, 2002

This filing is an original filing.